

I, Charity Grimm Krupa, Esq. declare that the following statements are true and correct to the best of my recollection:

1. I am a plaintiff in the above-captioned lawsuit.
2. I live in Fayette County, Pennsylvania.
3. I am a member of the Pennsylvania House of Representatives serving the 51st Legislative District.
4. I am also currently a candidate for the Pennsylvania House of Representatives 51st Legislative District.
5. I was sworn in as a State Representative on January 3, 2023 and took the following solemn oath:

I do solemnly swear that I will support, obey and defend the Constitution of the United States and the Constitution of this Commonwealth and that I will discharge the duties of my office with fidelity.

6. Prior to serving in the Pennsylvania House of Representatives, I maintained a general law practice in southwestern Pennsylvania with a special interest and focus on constitutional and civil rights claims.
7. I firmly believe that the Constitution of the United States is what makes our country the beacon of light and liberty for the entire world.

8. I firmly believe that the future of our nation and our commonwealth hinges upon strict adherence to the words and principles set forth in the Constitution of the United States and the Constitution of the Commonwealth of Pennsylvania.
9. I firmly believe that, as citizens, as professionals, and as elected officials, we must take action to ensure that the constitution is defended and that violations of the constitution by government actors are challenged- otherwise we risk losing the constitutional guarantee that our God-given, inalienable rights will not be infringed.
10. In the infinite wisdom of our founding fathers and mothers, the birth of our nation was premised upon clearly defined check and balances - ensuring that no one branch of government yielded unbridled power.
11. As part of the crucial checks and balances, powers were clearly divided between three separate and distinct branches – executive, judicial, and legislative, each with its own distinct rights and responsibilities.
12. The separation of powers also included the creation of two separate and distinct sovereign powers – the national government and state government, each with its own distinct rights and responsibilities.
13. Under the Electors Clause, the Elections Clause and the Pennsylvania Constitution, the Pennsylvania state legislators must enact laws to regulate the times, places, and manner of Presidential and Congressional elections.
14. On March 7, 2021, President Biden unconstitutionally excluded Pennsylvania lawmakers from the law-making process of regulating federal elections for President and Congress by signing Executive Order 14019 on “Promoting Access to Voting.”

15. Executive Order 14019 mandates distributing voter registration and vote-by-mail ballot application forms.
16. Executive Order 14019 mandates assisting applicants in completing voter registration and vote-by-mail ballot application forms.
17. Executive Order 14019 mandates the solicitation and facilitation of third-party organizations and state officials to provide voter registration services on agency premises.
18. Typically, private parties – including plaintiffs, campaigns, political parties, and organizations – conduct voter registration drives as acknowledged and regulated by federal campaign finance laws.
19. Through Executive Order 14019, President Biden violates the United States constitution by the unlawful exercise of authority not granted to the executive branch.
20. I have suffered and will continue to suffer irreparable harm if President Biden's unconstitutional actions are not immediately correct.
21. If left unchecked, Executive Order 14019 allows the executive branch of the government, through its administration to unilaterally conduct and conspire with unknown (yet most likely politically motivated) third parties to conduct not just voter registration activities but voting activity itself.
22. Irreparable and unmeasurable harm will be inflicted if one branch of government is permitted to ignore the constitution and unilaterally demand that taxpayer funds be used for the benefit of one political party seen through an increase in that party's voter registration numbers, an increase in that political party's voter turnout/ votes

casts, and potential ballot harvesting through mail-in ballot requests and “assistance” in the voting process.

23. As a political candidate of the opposite party, I have suffered emotional hardship and distress as a result of President Biden’s unlawful actions due to the fact that as a Republican candidate, I am automatically an underdog when considering that the federal government is potentially using taxpayer funds to stack the deck against not only me but against Republican candidates across the slate.
24. As a political candidate of the opposite party, I have and will continue to suffer financial costs as a result of President Biden’s unlawful actions due to the fact that as a Republican candidate, I will need to spend more time and resources to combat the unfair advantage that my democrat challengers will automatically have when considering that the federal government is potentially using taxpayer funds to stack the deck against not only me but against Republican candidates across the slate.
25. On September 19, 2023, Governor Shapiro announced that he was unilaterally implementing automatic voter registration in Pennsylvania.
26. Through Governor Shapiro’s September 19, 2023 edict, Commonwealth residents obtaining new or renewed driver licenses and ID cards were automatically registered to vote unless they opt out of doing so.
27. Many constituents have expressed disapproval of Governor Shapiro’s illegal edict and have raised concerns over the possibility of illegal immigrants and other ineligible persons from being registered to vote and, in turn, actually voting.
28. At a time when faith in the election system is low and concerns with election integrity is sky high, Governor Shapiro’s unconstitutional actions are causing irreparable harm

as some voters will refuse to register and/or vote if they believe that the elections are unfair, rigged or that their vote does not count.

29. As a political candidate, I have suffered emotional hardship and distress as a result of Governor Shapiro's unlawful actions due to the fact that I will need to spend more time, energy and resources attempting to register eligible individuals to vote and to convince them that their vote does count so that they will actually vote in upcoming elections.

Dated: February 12th, 2024

/s/Charity Grimm Krupa

Charity Grimm Krupa, Esq.